

May 9, 2002

Mr. Russell Eiler  
Von Duprin, Inc.  
2720 Tobey Drive  
Indianapolis, IN 46219

Re: 097-15633-00050  
Third Administrative Amendment to  
FESOP 097-6983-00050

Dear Mr. Eiler:

Von Duprin, Inc. was issued a permit (FESOP 097-6983-00050) on June 23, 1998 related to surface coating of miscellaneous metal parts with coatings and/or powders, decorative chromium electroplating and metal trimming and stamping of architectural hardware products.

On August 31, 1998, the First Administrative Amendment (AAF097-9993-00050) was issued, due to the "Modifications Limited by Physical or Operational Constraints."

On February 28, 2000, the Second Administrative Amendment (AAF097-11169-00050) was issued, due to the addition of the Powdercoat Paint Removal System.

On February 25, 2002, an application from Von Duprin, Inc. was received, requesting the transfer of one (1) polishing unit with attached baghouse from Emission Unit ID PU-8 to Emission Unit ID PU-3, the addition of one (1) polishing unit with attached baghouse identified as Emission Unit ID PU-4, and the addition of one (1) hand polisher workstation (hand lathe) to Emission Unit ID PU-6A.

This application has been reviewed. Based on the data submitted by the source, it has been determined that the transfer of one (1) polishing unit within the facility and the addition of a new polishing unit with attached baghouse to be located at 2720 Tobey Drive, Indianapolis, IN, 46219, is classified as exempt from air pollution permit requirements, and, pursuant to the provisions of 326 IAC 2-8-10(a)(14), an Administrative Amendment to the Federally Enforceable State Operating Permit (FESOP) number F097-6983-00050. The permit is hereby administratively amended as follows. The bold language is new language that has been added, and the language with a line through it has been taken out. These are only being used in this letter to emphasize the change made. The permit will already be revised to state:

1. The emission units and control equipment summary in A.2 is amended to reflect the transfer of one (1) Acme Robotic Polishing Unit from Emission Unit ID PU-8 and the addition of one (1) hand polisher workstation (hand lathe) to Emission Unit ID PU-6A to serve strictly as a means to correct robotic polishing defects. This will affect page 6 of 48 of the FESOP. The permit is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

....

- (5) Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing

miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. **This Emission Unit also contains one (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 250 units per eight hour shift with each unit weighing approximately 0.13 pounds. This emission unit is equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back into the building. One (1) of the six (6) Polishing Units, at Exemption level, is being was installed in 1998. Installation date of 1986. The remaining five (5) Polishing Units were installed in 1986.**

- (6) Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back into the building. ~~Installation date of 1986. These units were installed in 1986.~~
- (7) ~~Seven (7)~~ **Six (6)** Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back into the building. Two (2) of the ~~seven (7)~~ **six (6)** Polishing Units, at Exemption level, ~~are being were~~ installed in 1998. ~~Installation date of 1986. The remaining four (4) were installed in 1986.~~

- 2. The emission units and control equipment summary in A.3 is amended to reflect the transfer of one (1) polishing unit with attached baghouse from PU-8 to Emission Unit ID PU-3 and the addition of one (1) stand-alone polishing unit with attached baghouse (identified as Emission Unit ID PU-4) to the list of insignificant activities. This will affect pages 6 and 7 of 48 of the FESOP. The permit is amended as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

....

- (26) **One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 300 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 3 and exhausting back into the building.**
- (27) **One (1) Robotic Polishing Unit identified as Emission Unit ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 220 units per eight hour shift with each unit weighing, approximately, 0.95 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 4 and exhausting back into the building.**

3. The description box in D.3 is amended to reflect the transfer of one (1) Acme Robotic Polishing Unit from Emission Unit ID PU-8 and the addition of one (1) hand polisher workstation (hand lathe) to Emission Unit ID PU-6A. Description boxes D.1, D.2, and D.3 have been updated to the current format. This will affect pages 28, 31, and 36 of 48 of the FESOP. The permit is amended as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:**

**One (1)** F-systems custom built solid lubricant application booth, identified as Emission Unit ID SL-01, and exhausting at Stack/Vent ID SV25, for surface coating of miscellaneous metal parts. This unit has a maximum coating consumption capacity of 4.69 gallons of coating per hour, and is equipped with dry filters for over spray control. An associated F-Systems curing oven burning natural gas with a rated heat input of 2.0 million Btu per hour is also present. Both units were installed in 1998.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

SECTION D.2

FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:**

Emission Unit ID  
SHL-5

**(a) Facility Description [326 IAC 2-8-4(10)] One (1)** Single Hoist Line decorative chromium electroplating line identified as Emission Unit ID SHL-5. Includes Tank # 20 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 20 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 5. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

Emission Unit ID  
DHL-13

**(b) Facility Description [326 IAC 2-8-4(10)] One (1)** Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

SECTION D.3

FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:**

~~Emission Unit ID~~  
~~PU-6A~~

~~(a) Facility Description [326 IAC 2-8-4(10)]~~ Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. **This Emission Unit also contains one (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 250 units per eight hour shift with each unit weighing approximately 0.13 pounds. This emission unit is equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back in to the building. One (1) of the six (6) Polishing Units, at Exemption level, is being was installed in 1998. Installation date of 1986. The remaining five (5) Polishing Units were installed in 1986.**

~~Emission Unit ID~~  
~~PU-6B~~

~~(b) Facility Description [326 IAC 2-8-4(10)]~~ Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back in to the building. Installation date of 1986.

~~Emission Unit ID~~  
~~PU-8~~

~~(c) Facility Description [326 IAC 2-8-4(10)]~~ ~~Seven (7)~~ **Six (6)** Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back in to the building. Two (2) of the ~~seven (7)~~ **six (6)** Polishing Units, at Exemption level, ~~are being were~~ installed in 1998. ~~Installation date of 1986.~~ **The remaining four (4) were installed in 1986.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

4. The description box in D.4 is amended to reflect the transfer of one (1) polishing unit with attached baghouse from PU-8 to Emission Unit ID PU-3 and the addition of one (1) stand-alone polishing unit with attached baghouse (identified as Emission Unit ID PU-4) to the list of insignificant activities. The description box in section D.4 has been updated to the current format. This will affect page 38 of 48 of the FESOP. The permit is amended as follows:

SECTION D.4

FACILITY OPERATION CONDITIONS

Insignificant Activities

**Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activities)**

- (1) Orr and Sembower natural gas fired boiler identified as Emission Unit ID CU-1 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (2) Dunham Bush natural gas fired boiler identified as Emission Unit ID CU-2 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (3) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (4) Powder coating of miscellaneous metal parts in powder coating spray booths identified as Emission Unit ID PB-1, PB-2 and PB-3 at a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a cartridge dust collector exhausting back in to the building. Equipped with a natural gas fired dry off oven identified as Emission Unit ID CU-10 with a maximum heat input capacity of 1.0 million Btu per hour and exhausting at Stack/Vent ID 22. Also, equipped with two (2) powder coating natural gas fired cure ovens identified as Emission Unit ID CU-11 and CU-12 each with a maximum heat input capacity of 2.5 million Btu per hour and exhausting at Stack/Vent ID 23 and 24.
- (5) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as Emission Unit ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a Torit cartridge dust collector and exhausting at Stack/Vent ID PB-14. Equipped with a natural gas fired cure oven identified as Emission Unit ID CU-7 with a maximum heat input capacity of 0.8 million Btu per hour and exhausting at Stack/Vent ID 14.
- (6) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-1 for polishing miscellaneous metal parts at a maximum capacity of 576 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 1A. Installation date of 1998.
- (7) **One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 300 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 3 and exhausting back into the building.**
- (8) **One (1) Robotic Polishing Unit identified as Emission Unit ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 220 units per eight hour shift with each unit weighing, approximately, 0.95 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 4 and exhausting back into the building.**

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

5. The addition and transfer of polishing units with attached baghouse requires that Emission Units PU-3 and PU-4 are included in Particulate Matter (PM) limitations under D.4.2. This will affect pages 39 and 40 of 48 of the FESOP. The permit is amended as follows:

**D.4.2 Particulate Matter (PM) [326 IAC 6-3]**

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- a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from powder coating operations in Emission Unit ID PB-1, PB-2, PB-3 and PB-14 and the particulate matter (PM) emissions from polishing operations in Emission Unit ID PU-1, **PU-3, and PU-4** shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- b) At a process weight rate of less than 100 pounds per hour for Emission Units ID PB-1, PB-2, PB-3, PB-14 and PU-1, **PU-3, and PU-4** PM emissions from each Emission Unit ID, pursuant to 326 IAC 6-3-2, shall be limited to 0.55 pounds per hour.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nikki Olsen, at (317) 327-2182.

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez  
Administrator  
Office of Environmental Services  
City of Indianapolis

Attachments: FESOP Administrative Amendment AAF 097-15633-00050 (11 pages)

cc: file (2 copies)  
Mindy Hahn, IDEM

NJO

# **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)**

## **OFFICE OF AIR QUALITY and INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Von Duprin  
2720 Tobey Drive  
Indianapolis, Indiana 46219**

Von Duprin (herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|--|--|
| Operation Permit No.: F097-6983-00050  |  |
| Issued by:<br>Robert F. Holm, PhD.<br>Administrator<br>Environmental Resources Management Division                           | Issuance Date: June 23, 1998<br><br>Expiration Date: June 23, 2003 |
| First Administrative Amendment: AAF097-9993-00050  |  |
| Pages Affected: 5, 27, 28 ,29, 43, and 44  |  |
| Issued by: Original Signed by Robert F. Holm<br>Robert F. Holm, Administrator<br>Environmental Resources Management Division | Issuance Date: August 31, 1998                                     |

|   |  |  |
|---|--|--|
| Second Administrative Amendment: AAF097-11169-00050                                     |  | Pages Affected: 7                                    |
| Issued by:<br>Robert Holm, Administrator<br>Environmental Resources Management Division |  | Issuance Date: February 28, 2000                     |
| Third Administrative Amendment: AAF097-15633-00050                                      |  | Pages Affected: 6, 7, 7a, 28, 31, 36, 38, 39, and 40 |
| Issued by:<br><br>John B. Chavez<br>Administrator<br>Office of Environmental Services   |  | Issuance Date:                                       |



- (4) Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.
- (5) Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. This Emission Unit also contains one (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 250 units per eight hour shift with each unit weighing approximately 0.13 pounds. This emission unit is equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back into the building. One (1) of the six (6) Polishing Units, at Exemption level, was installed in 1998. The remaining five (5) Polishing Units were installed in 1986.
- (6) Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back into the building. These units were installed in 1986.
- (7) Six (6) Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back into the building. Two (2) of the six (6) Polishing Units, at Exemption level, were installed in 1998. The remaining four (4) were installed in 1986.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Orr and Sembower natural gas fired boiler identified as Emission Unit ID CU-1 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (3) Dunham Bush natural gas fired boiler identified as Emission Unit ID CU-2 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (4) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6,
- (5) Applications of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C or
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C.The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (9) Closed loop heating and cooling systems.
- (10) Infrared cure equipment.
- (11) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (15) Equipment used to collect any material that might be released during a malfunction, process upset or spill cleanup including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (16) Blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower.
- (17) On site fire and emergency response training approved by the department.
- (18) Grinding and machining operations controlled by fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate of less than or equal to 4000 acfm including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (19) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (20) Kolene Molten Salt Paint Stripping Bath for stripping paint racks identified as Emission Unit ID CU-9. Equipped with natural gas fired burner system at maximum heat input capacity of 1.8 million Btu per hour.
- (21) Powder coating of miscellaneous metal parts in powder coating spray booths identified as Emission Unit ID PB-1, PB-2 and PB-3 at a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a cartridge dust collector exhausting back in to the building. Equipped with a natural gas fired dry off oven identified as Emission Unit ID CU-10 with a maximum heat input capacity of 1.0 million Btu per hour and exhausting at Stack/Vent ID 22. Also, equipped with two (2) powder coating natural gas fired cure ovens identified as Emission Unit ID CU-11 and CU-12 each with a maximum heat input capacity of 2.5 million Btu per hour and exhausting at Stack/Vent ID 23 and 24.
- (22) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as Emission Unit ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a Torit cartridge dust collector and exhausting at Stack/Vent ID PB-14. Equipped with a natural gas fired cure oven identified as Emission Unit ID CU-7 with a maximum heat input capacity of 0.8 million Btu per hour and exhausting at Stack/Vent ID 14.
- (23) Turbo Disk room spray can paint spray booth. Maximum capacity is rated at one quart per day.
- (24) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-1 for polishing miscellaneous metal parts at a maximum capacity of 576 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 1A. Installation date of 1998.
- (25) One (1) 500-gallon liquid caustic compound removal tank and one (1) 500-gallon deionized water rinse tank to facilitate the removal of powdercoat paint (non-VOC).
- (26) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 300 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 3 and exhausting back into the building.

- (27) One (1) Robotic Polishing Unit identified as Emission Unit ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 220 units per eight hour shift with each unit weighing, approximately, 0.95 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 4 and exhausting back into the building.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) F-systems custom built solid lubricant application booth, identified as Emission Unit ID SL-01, and exhausting at Stack/Vent ID SV25, for surface coating of miscellaneous metal parts. This unit has a maximum coating consumption capacity of 4.69 gallons of coating per hour, and is equipped with dry filters for over spray control. An associated F-Systems curing oven burning natural gas with a rated heat input of 2.0 million Btu per hour is also present. Both units were installed in 1998.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

The combined potential to emit VOC from Emission Unit ID SL-01 shall be limited to less than fifteen (15) pounds per day such that 326 IAC 8-2-9 does not apply.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations: Particulate Emission Limitations), PM emissions from Emission Unit ID SL-01 shall not exceed an allowable PM emission rate of 0.55 pounds per hour based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 20]

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content) and 326 IAC 20 (Hazardous Air Pollutants);

- (a) Any single regulated HAP emissions from surface coating operations in Emission Unit ID SL-01 shall not exceed 8.8 tons per rolling 365 consecutive day period.
- (b) Any combination sum of regulated HAPs emissions from Emission Unit ID SL-01 shall not exceed 23.4 tons per rolling 365 consecutive day period.

Any single HAP emissions and any combination sum of HAPs emissions are limited such that 326 IAC 2-7 (Part 70 Permit Program) does not apply.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Single Hoist Line decorative chromium electroplating line identified as Emission Unit ID SHL-5. Includes Tank # 20 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 20 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 20 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 5. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.
- (b) One (1) Dual Hoist Line decorative chromium electroplating line identified as Emission Unit ID DHL-13. Includes Tank # 58 emissions of which are controlled by a chemical wetting agent such that the surface tension of the Tank # 58 bath does not exceed 45 dynes per centimeter at any time during operation of the tank. Additionally, Tank # 58 emissions are directed to a packed bed scrubber at 4300 actual cubic feet per minute and exhausting at Stack/Vent ID 16. The scrubber does not need to be operated at all times but may be operated at Von Duprin's discretion. The installation date of the electroplating tank is 1986.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Chromium Electroplating NESHAP [40 CFR Part 63 Subpart N] [326 IAC 20-8]

The Permittee is subject to all applicable provisions of 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 326 IAC 20-8 (Hard and Decorative Chromium Electroplating and Anodizing Tanks).

- (a) Pursuant to 40 CFR Part 63 Subpart N and 326 IAC 20-8, each Chromium Electroplating tank in operation is subject to the following emission limitation:
  - (1) The surface tension of the chromium electroplating bath contained in each affected tank, under 40 CFR Part 63 Subpart N, shall not exceed forty-five (45) dynes per centimeter at any time during operation of the tank. The Permittee has chosen to accept this limitation in lieu of conducting a performance test which would determine the outlet chromium concentration and establish a site specific operating parameter that corresponds to compliance with 0.01 milligrams per dry standard cubic meter.
  - (2) Pursuant to 40 CFR Part 63.343(a)(1), the Permittee shall have achieved compliance with the emission limitations and standards of 40 CFR Part 63.342 no later than one (1) year after January 25, 1995.
- (b) Pursuant to 40 CFR Part 63.342(f)(3) and 326 IAC 20-8, the Permittee shall have prepared an Operation and Maintenance Plan and implemented it no later than one (1) year after January 25, 1995. The plan shall include the following elements:
  - (1) The plan shall specify the operation and maintenance criteria for each affected source and process monitoring and shall include a standardized checklist to document the operation and maintenance of this equipment.
  - (2) The plan shall specify procedures to be followed to ensure that equipment or

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Six (6) Acme Robotic Polishing Units identified as Emission Unit ID PU-6A for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift with each unit weighing, approximately, 0.13 pounds. This Emission Unit also contains one (1) Hand Polisher Work Station Unit for the correction of robotic polishing defects at a maximum capacity of 250 units per eight hour shift with each unit weighing approximately 0.13 pounds. This emission unit is equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6A and exhausting back in to the building. One (1) of the six (6) Polishing Units, at Exemption level, was installed in 1998. The remaining five (5) Polishing Units were installed in 1986.
- (b) Twenty four (24) Hand Polisher Work Station Units identified as Emission Unit ID PU-6B for polishing miscellaneous metal parts at a maximum capacity of 250 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 6B and exhausting back in to the building. These units were installed in 1986.
- (c) Six (6) Acme Robotic Polishing Units and one (1) Acme Buffing Unit identified as Emission Unit ID PU-8 for polishing miscellaneous metal parts with a maximum capacity of each Polishing Unit of 600 units per eight hour shift and maximum capacity for the Buffing Unit of 500 units per eight hour shift. Each unit weighs, approximately, 0.13 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 8 and exhausting back in to the building. Two (2) of the six (6) Polishing Units, at Exemption level, were installed in 1998. The remaining four (4) were installed in 1986.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Particulate Matter [326 IAC 6-3-2]

- c) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from polishing operations in Emission Unit ID PU-6A, PU-6B and PU-8 shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- b) At a process weight rate of less than 100 pounds per hour for Emission Unit ID PU-6A and PU-8, PM emissions from each Emission Unit ID, pursuant to 326 IAC 6-3-2, shall be limited to 0.55 pounds per hour.
- c) At a process rate of 232.5 pounds per hour for Emission Unit ID PU-6B, PM emissions from Emission Unit ID PU-6B, shall be limited to 0.97 pounds per hour.

#### D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID PU-6A, PU-6B and PU-8 and its control device(s).

### Compliance Determination Requirements

#### D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activities)

- (1) Orr and Sembower natural gas fired boiler identified as Emission Unit ID CU-1 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (2) Dunham Bush natural gas fired boiler identified as Emission Unit ID CU-2 with maximum heat input capacity equal to five (5.0) million Btu per hour.
- (3) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (4) Powder coating of miscellaneous metal parts in powder coating spray booths identified as Emission Unit ID PB-1, PB-2 and PB-3 at a total maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a cartridge dust collector exhausting back in to the building. Equipped with a natural gas fired dry off oven identified as Emission Unit ID CU-10 with a maximum heat input capacity of 1.0 million Btu per hour and exhausting at Stack/Vent ID 22. Also, equipped with two (2) powder coating natural gas fired cure ovens identified as Emission Unit ID CU-11 and CU-12 each with a maximum heat input capacity of 2.5 million Btu per hour and exhausting at Stack/Vent ID 23 and 24.
- (5) Mullion powder coating of miscellaneous metal parts in one (1) powder coating spray booth identified as Emission Unit ID PB-14 with a maximum surface coating capacity of ten (10) pounds of powder coating per hour. Equipped with a Torit cartridge dust collector and exhausting at Stack/Vent ID PB-14. Equipped with a natural gas fired cure oven identified as Emission Unit ID CU-7 with a maximum heat input capacity of 0.8 million Btu per hour and exhausting at Stack/Vent ID 14.
- (6) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-1 for polishing miscellaneous metal parts at a maximum capacity of 576 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a Torit cartridge dust collector identified as Stack/Vent ID 1A. Installation date of 1998.
- (7) One (1) Acme Robotic Polishing Unit identified as Emission Unit ID PU-3 for polishing miscellaneous metal parts at a maximum capacity of 300 units per eight hour shift with each unit weighing, approximately, 0.31 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 3 and exhausting back into the building.
- (8) One (1) Robotic Polishing Unit identified as Emission Unit ID PU-4 for polishing miscellaneous metal parts at a maximum capacity of 220 units per eight hour shift with each unit weighing, approximately, 0.95 pounds. Equipped with a cartridge dust collector identified as Stack/Vent ID 4 and exhausting back into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from Emission Unit ID CU-1 and Emission Unit ID CU-2 shall each be limited to 0.6 pounds per million Btu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter (PM) emitted per million Btu heat input.  
Q = Total source operating capacity rating in million Btu per hour heat input.

#### D.4.2 Particulate Matter (PM) [326 IAC 6-3]

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- a) Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from powder coating operations in Emission Unit ID PB-1, PB-2, PB-3 and PB-14 and the particulate matter (PM) emissions from polishing operations in Emission Unit ID PU-1, PU-3, and PU-4 shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- b) At a process weight rate of less than 100 pounds per hour for Emission Unit ID PB-1, PB-2, PB-3, PB-14 and PU-1, PU-3, and PU-4, PM emissions from each Emission Unit ID, pursuant to 326 IAC 6-3-2, shall be limited to 0.55 pounds per hour.

#### D.4.3 Volatile Organic Compounds (VOC)

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).



- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### **Compliance Determination Requirement**

##### **D.4.4 Testing Requirements [326 IAC 2-8-5(1)]**

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Testing of these facilities is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.4.1 and/or D.4.2 shall be determined by a performance test conducted in accordance with Section C.8 - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.